

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF MISSOURI
SOUTHERN DIVISION**

In the Matter of the Complaint of)	
Branson Duck Vehicles, LLC, as)	
Owner; and Ripley Entertainment,)	Case Number 18-cv-03339-MDH
Inc. as Owner <i>pro hac vice</i> of the)	Consolidated With
<i>STRETCH DUCK 07</i> for Exoneration)	Case Number 19-cv-5006-MDH
From or Limitation of Liability)	

MOTION FOR LEAVE TO FILE EXCESS PAGES

Pursuant to Local Rule 7.0(d), Limitation Claimants (listed in signature line below, hereinafter collectively, “Limitation Claimants”), move the Court for leave to file an additional fifteen (15) pages in connection with their forthcoming Suggestions in Opposition to Limitation Plaintiffs’ Motion in Support of Admiralty Jurisdiction filed by Branson Duck Vehicles, LLC and Ripley Entertainment, Inc. (ECF Doc. 187), up to and including a total of thirty (30) pages. In support of this Motion, Limitation Claimants state as follows:

1. Pursuant to the Court’s Case Management Schedule and Order (ECF No. 135), Limitation Claimants are to file their suggestions in opposition to Limitation Plaintiffs’ anticipated Motion in Support of Admiralty Jurisdiction by July 22, 2019.
2. As the Court is aware, this litigation arises out of the duck boat accident that occurred on Table Rock Lake on July 19, 2018. Numerous claims have been

asserted against Limitation Plaintiffs, and a question has been raised regarding the existence of admiralty jurisdiction over the accident.

3. The factual and legal issues inherent in adjudication of navigability of Table Rock Lake for the exclusive purpose of admiralty jurisdiction have produced voluminous documents from both Limitation Plaintiffs and Limitation Claimants, including expert reports and depositions, all of which require full and complete briefing.

4. Given the complexity of the claims and issues before this Court, Limitation Claimants respectfully request a total of thirty (30) pages to develop and brief their position on jurisdiction matters.

5. Limitations Claimants consented to Limitation Plaintiffs' request for a limit of thirty (30) pages for Limitation Plaintiffs' brief (which was granted by this Honorable Court on June 27, 2019 - ECF 184), and Limitation Plaintiffs have consented to this reciprocal request (ECF 182) in this litigation.

6. In the interest of justice, it is requested that this extension for a total of thirty (30) pages be granted.

WHEREFORE, Limitation Claimants respectfully request that the Court grant this motion and give them leave to file a total of thirty (30) pages in connection with their forthcoming Suggestions regarding jurisdictional issues; and for such other and further relief as the Court deems just and proper.

Respectfully submitted,

/s/ Ronnie G. Penton

Ronnie G. Penton LA #10462

Appearing *Pro Hac Vice*

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Representing Lisa Berry, Marlo Rose Wells, Belinda Coleman (Deceased), and Angela Coleman (Deceased); Tia Coleman, Glenn Coleman (Deceased), Reece Coleman (Deceased), Evan Coleman (Deceased), and Arya Coleman (Deceased); Ronita McKinley, Gary McKinley, Shayne Collins, Tiffany Collins, T.K. (a minor); Talyssa Mann, Tomlyn McDonald, Dustin McDonald, Ca M (a minor), and Ch M (a minor); Todd Dennison and Shaunna Cumberworth; Brian Dennison, Todd Dennison, and Doug Dennison; Mamadou Ly; National Bank of Indianapolis, Temporary Guardian over the Estate of D.H. (a minor)

Date: July 9, 2019

CERTIFICATE OF SERVICE

I hereby certify that the above and foregoing pleading was served on all counsel of record and/or all parties by email and/or by placing a copy of same in the United States Mail, postage pre-paid, properly addressed, and deposited same in a post office or official depository under the exclusive care and custody of the United States Postal Service, and/or through the CM-ECF system of the United States District Court for the Western District of Missouri on this date.

July 9, 2019

/s/ Ronnie G. Penton

Ronnie G. Penton